

11<sup>th</sup> March 2026

The Planning Policy Team,  
The Vale of Glamorgan Council,  
Civic Offices,  
Holton Road,  
Barry  
CF63 4Ru



deunyddiau hanfodol  
atebion cynaliadwy

essential materials  
sustainable solutions

MPA Wales/Cymru

[www.mineralproducts.org](http://www.mineralproducts.org)

Email: [LDP@valeofglamorgan.gov.uk](mailto:LDP@valeofglamorgan.gov.uk)

Dear Sir/Madam

**REPLACEMENT LOCAL DEVELOPMENT PLAN 2021 - 2036 (NOVEMBER 2025)**

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and industrial sand industries. MPA is the sectoral voice for mineral products, covering 100% of UK cement and lime production, 90% of GB aggregates production, 95% of asphalt and over 60% of ready-mixed concrete and precast concrete production. In 2023, the industry supplied £18.4 billion worth of materials and services to the Economy, directly generating £6.7 billion in Gross Value Added (GVA). It is the largest supplier to the construction industry, which generated £141.5 billion in GVA in 2023. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: [www.mineralproducts.org](http://www.mineralproducts.org).

Thank you for consulting us on the above document. Mineral supply will be critical to delivering many of the objectives identified in the preferred strategy as well as many of the national infrastructure project proposed such as floating offshore wind in the Celtic Sea. We have major concerns over the reliance on outdated reserve information and the evidence base must reflect up to date reserve and sales statistics, together with projected demand for major developments.

It is disappointing that despite previous representations in 2022 & 2024, the points highlighted have not been addressed. We have therefore, reiterated our concerns below. We have also suggested alternative wording where appropriate.

We welcome further engagement on this matter to address the concerns.

Yours faithfully

A handwritten signature in blue ink, appearing to read 'Nick Horsley', is placed over a light blue rectangular background.

Nick Horsley  
Director of Planning, MPA Wales



MPA Wales/Cymru is part of the Mineral Products Association, the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and industrial sand industries

Registered in England as Mineral Products Association Limited. No. 1634996.  
Registered address: 1st Floor, 297 Euston Road, London NW1 3AD

| Page/Para/<br>Policy | Current Wording                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | MPA Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Amendments<br>required                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
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| 2.50                 | Regional Technical Statement for Aggregates (2020) Second Review                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | We support the reference to the RTS (2 <sup>nd</sup> Review), however, as the authority should be aware, WG has commission a further review (RTS3) which is expected to be published at the end of 2026/early 2027                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Note the comment as this will be a material consideration as the plan progresses.                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 5.35                 | Barry Docks - ABP Masterplan.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | <b>Support</b> - We note ABP's potential for rare earth processing at the Black Rocks Growth Zone and would support such a proposal.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | No further comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| SP17                 | SUSTAINABLE WASTE MANAGEMENT                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | <b>Support</b> - We note the proposals to facilitate sustainable waste management facilities on .... operational or non-operational mineral working sites and would support this.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | No further comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| SP18                 | <p>Sustainable Provision of Minerals</p> <p>The local and regional need for the provision of a continuous supply of minerals will be achieved through:</p> <p>1 Maintaining a minimum of 10 years land bank of crushed rock throughout the plan period.</p> <p>2 Favouring proposals which promote the sustainable use of minerals and encourage the use of secondary and alternative resources.</p> <p>3 The safeguarding of known resources of sandstone, limestone, sand and gravel (where these occur outside settlements), from permanent development that would unnecessarily sterilise them or hinder their future extraction; and</p> <p>4 Safeguarding railheads to allow for the potential</p> | <p><b>Object</b> - Whilst we can support various elements in the proposed policy, we have concerns over the specific wording in it and the supporting text.</p> <p>Most notably, subsection 2 does not accord with the PPW (5.11.4) in relation to the use of secondary and <u>recycled</u> materials. It is not clear what is meant by <u>"alternative resources"</u>. This should be replaced. Secondly, PPW <u>"promotes the use"</u> and does not reference <u>"favouring proposals"</u>. Accordingly, the wording should be amended to reflect PPW</p> <p>Also, in relation to subsection 4, the proposed policy does not seek to apply safeguarding to minerals infrastructure as is required by PPW (5.14.7 &amp; 5.24.8). Minerals infrastructure is more than just transportation hubs, it includes the wider processing facilities. Subsection 4 should therefore be amended.</p> | <p>The Policy should be amended to read -</p> <p><del>"2 Favouring proposals which Promote the sustainable use of minerals and encourage the use of secondary and alternative resources."</del></p> <p><b><u>"4 Safeguarding existing and planned infrastructure, including railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, together with wider minerals processing infrastructure."</u></b></p> |

| Page/Para/<br>Policy | Current Wording                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | MPA Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Amendments<br>required                                                                                                                                                                                                                                                                                                                                                                                                   |
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|                      | transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate.                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 6.373                | This paragraph states <i>“The 2nd Review of the Minerals Regional Technical Statement for the South Wales area, commonly referred to as RTS2, was published by the South Wales Regional Aggregates Working Party (SWRAWP) in September 2020. Appendix B of the RTS includes specific recommendations and guidance for each Local Planning Authority.”</i>                                                                                                                                                                                                    | While this statement is factual, we suggest an additional sentence to reflect that Welsh Government has commissioned a further review of the Regional Technical Statement (RTS3) which has already commenced and is scheduled for completion by the end of 2026.                                                                                                                                                                                                                                                                                                                                                         | Add additional sentence to reflect RTS3.                                                                                                                                                                                                                                                                                                                                                                                 |
| 6.374                | This paragraph states <i>“In November 2021, the Welsh Government’s Chief Planning Officer issued a Policy Clarification letter to rectify an arithmetical error within the RTS2. The clarification letter indicated that the apportionment for the Vale of Glamorgan is 17.05 million tonnes of crushed rock over 25 years. There is an existing landbank of 18.73 million tonnes of crushed rock (as of 31st December 2016), all of which relates to Carboniferous Limestone. There is no apportionment and no land bank for land-won sand and gravel.”</i> | <p>We have significant concerns that the evidence base for the local plan has not been updated. Whilst RTS2 is undoubtedly material, the statement that <i>“There is an existing landbank of 18.73 million tonnes of crushed rock”</i> is not correct. As stated in the text, this is the landbank as of 31st December 2016. The Council must update its evidence base and provide a landbank figure which reflects the current permitted reserves.</p> <p>Since the publication of the RTS2, there have been numerous publications to assist in updating the evidence base including the SWRAWP reports and AM2023.</p> | <p>In our responses to earlier iterations and consultations on the RLDP we highlighted the need for the Council to update the reserve figures. We also highlighted that planning submissions had indicated that circa 16.5mt of permitted reserve is suitable for non-aggregate use.</p> <p>It is not clear if this tonnage is included in the 18.73mt referred to.</p> <p>Greater clarity and analysis is required.</p> |
| 6.374                | The wording also states <i>“The report concludes that in view</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | The “slight surplus” referred to was the position at 31 <sup>st</sup>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Update the reserve figures to allow an accurate landbank to                                                                                                                                                                                                                                                                                                                                                              |

| Page/Para/<br>Policy | Current Wording                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | MPA Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | Amendments<br>required                                                                                                                                                                    |
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|                      | <i>of the slight surplus of existing permitted crushed rock reserves and the lack of sand and gravel production in the Vale of Glamorgan, no further allocations are specifically required to be identified within the RLDP."</i>                                                                                                                                                                                                                                                                                                                                                                                                                                       | December 2016. The reserve figure needs to be updated.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | be determined and the need for future allocations to be properly assessed. This should separate out projected aggregate and non-aggregate reserves to ensure clarity.                     |
| 6.375                | The wording states <i>"The RTS2 requires Statements of Sub-regional Collaboration (SSRC) to be prepared by all constituent LPAs within each RTS sub-region. The Vale of Glamorgan along with Bridgend, Cardiff, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly and the Brecon Beacons National Park forms part of the Cardiff City subregion. The latest position statement for this sub-region (July 2022) indicates that while most authorities in the region, including the Vale of Glamorgan, can meet their apportionment for crushed rock, there is a shortfall of 7.475 million tonnes (Mt) within Cardiff that would require an additional RLDP allocation."</i> | Whilst the position statement referred to may suggest that the apportionment can be adequately met, as highlighted above, there are major concerns that the evidence base being relied upon is out of date. Further, Annex A of the RTS requires that <i>"The LPAs involved should demonstrate, as far as possible, that the SSRC has been produced in consultation with relevant stakeholders, including the Regional Aggregate Working Party (RAWP), as part of the LDP process."</i> This has not been done and as such the SSRC process adopted is fundamentally flawed. | As clearly stated in our previous representations, there are major concerns over the evidence base and the process of relying upon an SSRC which has not followed the requisite protocol. |
| MIN1                 | Development in Minerals Safeguarding Areas                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Whilst we support the principle of the policy, we suggest the addition of a further subsection addressing the scope for prior extraction. PPW (5.14.7) states <i>"the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered."</i>                                                                                                                                                                                                                                                                              | Add a further subsection to address the principle of prior extraction.                                                                                                                    |

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| MIN2                 | <p>Quarry Buffer Zones</p> <p>This policy states “Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:</p> <p>1 The proposal would not constrain the operations of the mineral site; or</p> <p>2 The proposal is located within an existing built-up area which already encroaches into the buffer zone.”</p>                                      | <p><b>Object</b> - Proposed subsection 2 is not an exception to the national buffer zone policy PPW (5.14.44) and should therefore be deleted.</p>                                                                                               | <p>Delete Subsection 2 “Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:</p> <p>1 The proposal would not constrain the operations of the mineral site; or”</p> <p><del>2 The proposal is located within an existing built-up area which already encroaches into the buffer zone.”</del></p>                                                                                                                                  |
| MIN4                 | <p>Sustainable Mineral Working.</p> <p>This policy states</p> <p>“Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured where this does not have an unacceptable effect on amenity or the environment.</p> <p>Proposals for the extraction of new primary minerals will only be permitted where there is a proven national, regional or local need for the mineral and where:”</p> | <p><b>Object</b> - This policy wording does not reflect PPW (5.11) which seeks to “promote” and not “prioritise” the use of recycled material and secondary aggregates.</p> <p>Further the word “only” is superfluous and should be deleted.</p> | <p>Reword the policy</p> <p>“Proposals which <u>promote</u> <del>prioritise</del> the use of recycled material and secondary aggregates <u>as an alternative to</u> <del>before new sources of</del> primary materials <del>are developed</del> will be <u>supported</u> <del>favoured</del> where this does not have an unacceptable effect on amenity or the environment.</p> <p>Proposals for the extraction of new primary minerals will <del>only</del> be permitted where there is a proven national, regional or local need for the mineral and where:”</p> |
| 6.388                | <p>The wording states “In view of the current landbank of reserves with planning permission at existing mineral working sites within the Vale of Glamorgan, there is no</p>                                                                                                                                                                                                                                                                                                          | <p>As stated above, the Evidence Base has not been updated to provide a true representation of the landbank. The permitted reserves being quoted date from 2016 and cannot provide a sound platform upon which mineral</p>                       | <p>Update the evidence as required.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

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|                      | <i>requirement for the Plan to allocate additional areas for limestone extraction."</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | provision or requirements can be determined.                                                                                                                                                                                                                                                                                                                                                                  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 6.389                | The wording states "Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured. The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore, the extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (MTAN1 Paragraph 34)." | As stated above, the PPW seeks to promote the use of secondary and recycled aggregates. The council has not provided any evidence that secondary and recycled materials are not being maximised, or that primary materials are being used instead of secondary material. There is simply no evidence of "overprovision". Further this is a misquote of MTAN1 Paragraph 34.<br><br>Amend the text accordingly. | Reword the text "Proposals which <del>prioritise</del> <u>promote</u> the use of recycled material and secondary aggregates <del>before new sources of</del> <u>as an alternative to</u> primary materials <del>are developed</del> will be <u>supported</u> favoured. <del>The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore,</del> The extraction of new primary minerals in addition to the landbank of permitted reserves will normally <del>only</del> be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified <del>(MTAN1 Paragraph 34)</del> ." |